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Attorney for Defendant BAXA CORPORATION

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 KATHLEEN SHINN and RICHARD SHINN,
11 Individually, as Heirs and as Personal Co-
Administrators of the Estate of ALYSSA SHINN,
12 Deceased,

13 Plaintiffs,

14 vs.

15 BAXA CORPORATION; MCKESSON
16 CORPORATION, a Delaware Corporation; DOES 1
through 50, and ROE CORPORATIONS 1 through 20;

18 Defendants.

19 Case No.: 2:07-CV-01648-JCM-PAL

20 **STIPULATION AND ORDER TO
CONTINUE BRIEFING AND HEARING
OF MOTION TO INTERVENE AND
MOTION FOR DETERMINATION OF
GOOD FAITH SETTLEMENT**

21 **(First Request)**

22 Plaintiffs Kathleen Shinn and Richard Shinn ("Plaintiffs"), by and through their counsel
Richard Harris Law Firm, Defendant Baxa Corporation ("Baxa"), by and through its counsel Morris
Polich & Purdy LLP, Defendant McKesson Corporation ("McKesson"), by and through its counsel
Lauria, Tokunaga, Gates & Linn, LLP, and Summerlin Hospital Medical Center ("Summerlin"), by
and through its counsel Hall Prangle & Schoonveld, LLC, hereby stipulate to extend the filing
deadlines for Baxa's response to Summerlin's Motion to Intervene and for Determination of Good
Faith Settlement [Doc 23], filed on April 1, 2008, to May 19, 2008, and Summerlin's reply to Baxa's
response for a period of eleven (11) days following the service of Baxa's response.

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28 This is the first requested extension.

This extension is required for Summerlin's full and complete disclosure and production of materials and records requested pursuant to Baxa's Notice of Taking Deposition of Custodian of Records of Summerlin Hospital Medical Center and Subpoena Duces Tecum served on March 3, 2008. The requested materials are necessary for Baxa to craft a clear and comprehensive response to the statements and arguments made by Summerlin. Baxa requires the review and analysis of the materials to be produced by Summerlin Hospital prior to responding to Summerlin's motion.

The parties request that the hearing of Summerlin's Motion to Intervene and for Determination of Good Faith Settlement [Doc 23] be continued for a period of thirty (30) days following briefing to allow for complete consideration by the parties.

The extension is also requested to allow Plaintiffs and Defendant Baxa Corporation to schedule mediation in an attempt resolve this matter prior to the hearing of said Motion.

IT IS SO STIPULATED.

MORRIS POLICH & PURDY LLP

DATED this 15 day of April, 2008.

~~NICHOLAS M. WIECZOREK~~

Nevada Bar No. 6170

JEANINE OLIVARES NAVARRO

Nevada Bar No. 10174

3930 Howard Hughes Parkway, Suite 360

Las Vegas, Nevada 89169

Attn: *Baxa Corporation*

RICHARD HARRIS LAW FIRM

DATED this day of April, 2008.

BY:

RICHARD HARRIS, ESQ.

Nevada Bar No. 505

KERRY L. EARLEY, ESO,

Nevada Bar No. 2298

801 South Fourth Street

301 South Euclid Street
Las Vegas Nevada 89101

Attorneys for Plaintiffs

Attorneys for Plaintiff
Kathleen Shinn and Rick

Kathleen Shinn and Richard Shinn

1 This extension is required for Summerlin's full and complete disclosure and production of
2 materials and records requested pursuant to Baxa's Notice of Taking Deposition of Custodian of
3 Records of Summerlin Hospital Medical Center and Subpoena Duces Tecum served on March 3, 2008.
4 The requested materials are necessary for Baxa to craft a clear and comprehensive response to the
5 statements and arguments made by Summerlin. Baxa requires the review and analysis of the materials
6 to be produced by Summerlin Hospital prior to responding to Summerlin's motion.

7 The parties request that the hearing of Summerlin's Motion to Intervene and for Determination
8 of Good Faith Settlement [Doc 23] be continued for a period of thirty (30) days following briefing to
9 allow for complete consideration by the parties.

10 The extension is also requested to allow Plaintiffs and Defendant Baxa Corporation to schedule
11 mediation in an attempt resolve this matter prior to the hearing of said Motion.

IT IS SO STIPULATED.

MORRIS POLICH & PURDY LLP

DATED this day of April, 2008.

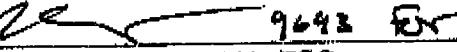
By:

NICHOLAS M. WIECZOREK
Nevada Bar No. 6170
JEANINE OLIVARES NAVARRO
Nevada Bar No. 10174
3930 Howard Hughes Parkway, Suite 360
Las Vegas, Nevada 89169
Attorney for Defendant *Baxa Corporation*

DATED this 16th day of April, 2008.

RICHARD HARRIS LAW FIRM

RICHARD HARRIS, ESQ.
Nevada Bar No. 505
KERRY L. EARLEY, ESQ.
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801 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiffs
Kathleen Shinn and Richard Shinn

1 LAURIA, TOKUNAGA, GATES & LINN, LLP
2
34 DATED this 16 day of April, 2008.5 BY: 
6 ANTHONY D. LAURIA, ESQ.
7 Nevada Bar No. 4114
8 601 South Seventh Street
9 Las Vegas, Nevada 89101
10 Attorneys for Defendant McKesson Corporation11 HALL, PRANGLE & SCHOONVELD, LLC
12
13
14

15 DATED this ____ day of April, 2008.

16 BY: _____
17 MICHAEL E. PRANGLE, ESQ.
18 Nevada Bar No. 8619
19 KENNETH M. WEBSTER, ESQ.
20 Nevada Bar No. 7205
21 777 North Rainbow Boulevard, Suite 225
22 Las Vegas, Nevada 89107
23 Attorneys for Summerlin Hospital24 ORDER
2526 IT IS SO ORDERED that Baxa Corporation's Response to Summerlin Hospital Medical
27 Center's Motion to Intervene and for Determination of Good Faith Settlement is due May 19, 2008;
28 Summerlin Hospital Medical Center's Reply to Baxa's Response is due eleven (11) days following the
service of Baxa's response; and the hearing of Summerlin Hospital Medical Center's Motion to
Intervene and for Determination of Good Faith Settlement is continued to29 _____
30 DATED: _____31 UNITED STATES MAGISTRATE JUDGE
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35

1 LAURIA, TOKUNAGA, GATES & LINN, LLP
2
3

4 DATED this ____ day of April, 2008.

5 BY: _____
6 ANTHONY D. LAURIA, ESQ.
7 Nevada Bar No. 4114
8 601 South Seventh Street
9 Las Vegas, Nevada 89101
10 Attorneys for Defendant McKesson Corporation

11 HALL, PRANGLE & SCHOONVELD, LLC

12 DATED this 16th day of April, 2008.

13 BY:  8452 / for
14 MICHAEL E. PRANGLE, ESQ.
15 Nevada Bar Bo. 8619
16 KENNETH M. WEBSTER, ESQ.
17 Nevada Bar No. 7205
18 777 North Rainbow Boulevard, Suite 225
19 Las Vegas, Nevada 89107
20 Attorneys for *Summerlin Hospital*

21 ORDER

22 IT IS SO ORDERED that Baxa Corporation's Response to Summerlin Hospital Medical
23 Center's Motion to Intervene and for Determination of Good Faith Settlement is due May 19, 2008;
24 Summerlin Hospital Medical Center's Reply to Baxa's Response is due eleven (11) days following the
25 service of Baxa's response; and the hearing of Summerlin Hospital Medical Center's Motion to
26 Intervene and for Determination of Good Faith Settlement is continued to

27 DATED: _____

28 UNITED STATES MAGISTRATE JUDGE